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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
 75 Hawthorne Street
 San Francisco, CA 94105

December 8, 2003

Luis Marmol
 c/o Design Curves
 824 W. 18th Street
 Costa Mesa, CA 92627

Keith Farrell, Designated Project Coordinator
 Meredith & Associates, Inc.
 9841 Airport Blvd., Suite 1010
 Los Angeles, CA 90045

Re: Dico Oil
EPA Unilateral Administrative Order (UAO) 9-2003-14

An original project workplan outline was submitted on September 17, 2003. Details on specific phases of the removal have been provided to me in a series of original workplan "Supplements". Each approved Supplement is summarized below.

Document	Submitted	Purpose
Orig. Workplan	9/17/03	Generic outline format, all project phases.
Supplement #1	9/25/03	Health and safety plan, sampling and analysis for bulk and non-bulk materials. Removal of non-bulk wastes.
Supplement #2	9/30/03	Revision to health and safety plan per OSC Benson comments.
Supplement #3	10/30/03	Bulk waste removal and tank decontamination, updated project health and safety plan.
Supplement #4	11/13/03	Tank and piping demolition, scraping and removal.
Supplement #5	11/21/03	Sampling and analysis of tank farm berm soils and additional sampling and analysis of certain tank solids.

It is my understanding that the key elements of each Supplement have been completed and that you are awaiting the analytical results of the November 25, 2003 sampling effort for the purposes of profiling and off-site handling of the accumulated tank and berm solids.

On November 12, 2003, I held a conference call with Luis Marmol (PRP), Iiona Martin (PRP representative), Ed Reynolds (PRP consultant), Danny Nunez (PRP consultant), and Max Weintraub (USEPA Region 9 PCB Coordinator). The meeting was precipitated, in part, by questions concerning the sampling requirements of the PCB Rule (40 CFR 761.61). The group discussed PCB Rule sampling design requirements for the UAO required Soil Sampling Plan (SSP) which is to follow all top-side site cleanup actions. In addition, it was agreed that the berm surrounding the tank farm (approximate 400' length), which has been previously characterized as PCB contaminated, would be excavated, stored in roll-off-bins on-site, and managed separately from the surface and near-surface soils which will be the focus of the SSP.

An unexpected volume of potentially VOC contaminated soil (unknown depth) was encountered at the footprint area of Tanks T2 and T3 after these tanks were cleared from the tank farm. The bottom of Tank T3 consisted of a wooden plank and gravel substrate and the bottom of Tanks T2 and TB were simple gravel substrates. This discovery may result in a new project phase that will have to be addressed prior to final design and implementation of the SSP. CWI has placed clean fill and plastic over the odorous area until a plan for characterization and removal is proposed.

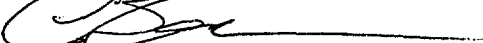
Significant remaining tasks under this UAO include, but are not limited to: the transportation and disposal of accumulated solids, excavation and removal of contaminated tank farm soils, and the submittal and implementation of the SSP (UAO ¶ 21e.).

The 90-day removal completion deadline (UAO ¶ 21) is approaching. Pursuant to UAO ¶ 55-58, you are directed to submit an extension request to continue operations beyond the 90 day removal completion deadline. This request should be centered around a proposed timeline which includes all remaining significant project tasks.

By this letter, I am also requesting a conference call between myself and Mr. K. Farrell (and anyone else designated by Mr. Marmol). The purpose of the call will be to align project expectations and to openly discuss any issues pertaining to the completion of this project.

Please provide (by electronic mail) your acknowledgment of receipt of this letter and proposed phone conference date and time (anytime 12/9, 12/10, or 12/11 preferred). I will continue to use electronic mail as the primary correspondence tool, but will mail hard copies of significant correspondence in accordance with UAO ¶ 26. Please contact me at benenson.craig@epa.gov.

Sincerely,



Craig Benson

U.S. EPA

Federal On-Scene Coordinator

cc: Elizabeth Cox, ORC